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September 27, 2023

VIA ECF

The Honorable Martin Glenn
Chief Bankruptcy Judge
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, New York 10004
mg.chambers@nysb.uscourts.gov

Re: In re Celsius Networks, LLC, Case No. 22-10964 (MG)
Written Request to Make Opening Statement at Confirmation Hearing

Dear Chief Judge Glenn:

Kleinberg, Kaplan, Wolff & Cohen is counsel to Harrison Schoenau (“Schoenau”). Schoenau writes pursuant to paragraph 1 of the Order Establishing Case Management Procedures for the Confirmation Hearing [ECF Doc. #3478] (the “Confirmation Procedures Order”) to request that the Court permit Schoenau, by counsel, to make an opening statement (the “Opening Statement”) not to exceed five (5) minutes in support of its limited objection to confirmation of the Modified Joint Chapter 11 Plan Of Reorganization Of Celsius Network LLC And Its Debtor Affiliates [ECF Docs. ## 3319, 3577] (the “Plan”).

Respectfully submitted,
/s/ Dov Kleiner